

# **Exhibit 22**

**AFFIDAVIT OF RAYMOND CORRELL**

RAYMOND CORRELL, BEING OF FULL AGE, ON HIS OATH, DEPOSES  
AND SAYS:

1. I am over the age of 21 and if sworn as a witness, I am competent to testify about the matters set forth herein, based upon personal knowledge, except where the matter is indicated to be based on information and belief.
2. I am a registered voter in Waterford Township, Michigan.
3. On November 4, 2020, I received an e-mail from the Michigan Education Association requesting nonpartisan observers at the TCF Center while the remaining absentee votes were counted.
4. I arrived at 11:30 am and was credentialed as a nonpartisan observer for the Lawyers' Committee for Civil Rights Under Law. I was allowed inside with my credentials.
5. I was outraged when I heard that Republicans were claiming that they were not allowed inside the TCF Center, because I observed one Republican and one Democrat at each table. I was asked to sign in as I entered the building. I was asked to sign out when I left. Each party had 134 people that were allowed inside. When the party reached 134, nobody else from that party was allowed inside. When I arrived, both Republicans and Democrats had 134 people present, and therefore, people from both parties were waiting outside. After the building reached capacity, nobody was allowed inside, regardless of political affiliation.
6. People were standing right over the election workers while they processed ballots. And, challengers were able to observe the ballots so closely that one Republican even challenged a ballot by claiming that the postmark on its envelope wasn't valid. The election worker handling the ballot showed the challenger the postmark to satisfy the challenge.
7. I observed one table where a Republican challenger was objecting to every ballot to ask to for its identifying information, which was provided to him each time. He was objecting simply to cause a delay. Many Republican challengers were frivolously challenging every single vote. They were also ignoring social distancing rules.
8. I was at the front of the room when the doors were locked. People outside then started yelling and screaming that they were not allowed to come in. They started pounding on the glass, and people were legitimately concerned that the glass might break from the pounding. The people outside were allowed to protest, but they became very disruptive. The people inside were scared. Because there were ballots being counted right under the windows that were being pounded on, the windows were covered up with cardboard after the protesting became too distracting.
9. I watched another Republican challenger challenge every ballot. As ballots were being duplicated, she stated, "I challenge all of those ballots from this one on." She did not give a basis for her challenge. I replied that I was watching the ballots being counted and that they should all be counted.
10. What was striking about the events at the TCF Center was that the most disruptive people were angry white people attempting to disenfranchise Black voters and intimidate Black election workers. I was impressed by the patience of the election workers, who were visibly affected by the

I affirm that the contents of this affidavit are true and correct to the best of my knowledge.

Signature of the person making this affidavit: [Signature]

Affirmed before me this 17<sup>th</sup> day of Nov, 2020 at 3806 Island PK Drive, Waterford, Mi

My commission expires on 11-03-2025

Signature of Officer Administering Oath [Signature]

Title \_\_\_\_\_

